

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA.

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

WACO DIVISION

NO **W19CA335**

Thomas A. Jamison

§ IN THE DISTRICT COURT

Plaintiff,

§

§

V.

§ WESTERN JUDICIAL DISTRICT

§

Facebook, Mark Zuckerberg, et al

§

PLAINTIFF'S ORIGINAL COMPLAINT

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Thomas A. Jamison, hereinafter called Plaintiff, complaining of
and about Mark Zuckerberg and Facebook, hereinafter called Defendants, and for cause of action
shows unto the Court the following:

DISCOVERY CONTROL PLAN LEVEL

1. Plaintiff intends that discovery be conducted under Title V Rule 26 FRCP

PARTIES AND SERVICE

2. Plaintiff, Thomas A. Jamison, is an Individual whose mailing address is P.O. Box 453 Burnet, TX. 78611. Plaintiff street address is 2015 E. Business 190 Apt #146 in Copperas Cove, TX. 76522. Coryell Country Texas.

3. Thomas A. Jamison has been issued a driver's license. Thomas A. Jamison has been issued a social security number.

4. Defendant Mark Zuckerberg, an Individual who conducts business in the state of Texas, may be served with process at his place of business at the following address: Facebook Legal Department 156 University Avenue Palo Alto, CA. 94301 _____

a. Defendant Facebook, a publicly traded corporation that conducts business in the state of Texas, may be served with process at its headquarters at the following address: Facebook Legal Department 156 University Avenue Palo Alto, CA. 94301. _____

Service of said Defendants as described above can be effected by personal delivery.

JURISDICTION AND VENUE

5. The subject matter in controversy is within the jurisdictional limits of this court
6. Plaintiff seeks:
 - a. monetary relief of \$500,000,000.00 and non-monetary relief.
7. This court has jurisdiction over the parties because Defendants conduct business in the state of Texas and Plaintiff resides in Texas
8. Venue in McLennan County is proper in this cause under 28 U.S.C. §1400 FRCP
 - (a) because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in Coryell county.

FACTS

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FACTS

9. Defendants, government employees of the C.I.A. created a social network which was a government program known as "lifelog" that established a public platform for internet users to interact with one another and express their opinions and beliefs on social and political issues. This in turn, created an expectation of free speech by its users.

10. Plaintiff Thomas Alan Jamison started a facebook account in 2009.

11. Defendants never suspended Plaintiffs account until he began to post conservative views that supported the Republican party.

12. Soon after Plaintiff began posting things that questioned the leadership of the democratic party and supporting the republican party, Defendants began to censor and restrict nearly everything that Plaintiff posted.

13. Defendants have established community rules and standards that discriminate against Plaintiffs Christian and conservative beliefs and opinions while allowing every liberal belief and opinion to be expressed without restriction.

14. Defendants restricted Plaintiffs account, for "hate speech" when Plaintiff expressed his disgust with a "sexual activity"(based on his religious and moral beliefs) rather than any "person".

15. Each time that Defendants have violated Plaintiffs rights by restricting his account, Plaintiff was unable to share his condolences with friends who lost a loved one who died or express his happy birthday wishes with friends and family. Any entity that exerts substantial power over the daily lives of the majority of American citizens does constitute a governance over the lives of those they control/govern. Facebook has set themselves up as a form of American government which does extend protections of the United States Constitution for all American citizens who are subject to the exercise of such "Government" by the Facebook Governors.

THOMAS JAMISON'S CLAIM FOR VIOLATION OF FREEDOM OF SPEECH

16. Plaintiff expressed his religious belief that the practice of homosexuality is repugnant sex act and Defendants restricted his ability to post for 30 days, claiming that this belief constituted "hate speech" in the absence of Plaintiff making any reference to any person, or expressing hatred for any particular person.

THOMAS JAMISON'S CLAIM FOR HARASSMENT

17. Defendants restricted Plaintiffs account for posting a harmless video of he and his son practicing karate together, claiming that it violated their community standards despite the fact that the video had been posted for over a year already. Defendants also restricted Plaintiff for sharing posts that they did not restrict others for posting.

THOMAS JAMISON'S CLAIM FOR VIOLATION OF EQUAL PROTECTION

18. Defendants restricted Plaintiffs account for sharing memes and videos that already existed on their social media website prior to Plaintiff sharing them.

**THOMAS JAMISON'S CLAIM FOR VIOLATION OF FREEDOM OF SPEECH AND TO PEACEFULLY
ASSEMBLE**

19. Defendants restricted Plaintiff's account, preventing him from peacefully assembling with the members of the groups that he is a member of each time they restricted his account. Facebook masquerading as a "private" company cannot deceive the American people who know that Facebook is a government project known as "lifelog".

**THOMAS JAMISON'S CLAIM FOR DISCRIMINATION IN VIOLATION OF THE FOURTEENTH
AMENDMENT**

20. Defendants have repeatedly discriminated against Plaintiff due to his religious beliefs in violation of the Fourteenth Amendment of the United States Constitution.

**THOMAS JAMISON'S CLAIM FOR VIOLATION OF RIGHT TO PRIVACY IN SELLING PRIVATE
INFORMATION OF USERS**

21. Facebook has engaged in a practice of selling the private information of Plaintiff by selling his information without his permission and keeping such private information when account is deactivated and/or suspended as though they own this information rather than Plaintiff

THOMAS JAMISON'S CLAIM FOR VIOLATION OF FOURTEENTH AMENDMENT RIGHT TO DUE PROCESS IN SUSPENDING ACCOUNT AND ACCESS TO LOVED ONES WITHOUT A HEARING IN ADVANCE

22. Defendants who are acting as government officials in their exercise of power over American citizens have violated the rights of Plaintiff in refusing to grant any form of grievance procedure as required by the Fourteenth Amendment given that loss of access to communicate with loved ones does constitute a "grievance loss".

ARGUMENT

The courts must recognize that any agency that has established control over the majority of American citizens with regard to rights that are protected by the United States Constitution, must comply with the laws that protect those rights despite the claim by the agency that they are a "private" entity. The courts MUST recognize that the protected rights of the majority of the population of American citizens takes priority over the rights of the private agency to control the lives of those citizens who are ENTITLED to the protections of the United States Constitution. The Courts MUST recognize the fact that the rights of the American people take priority over the rights of the private company when that private company has manipulated the system so that they have gained control of the majority of American citizens lives in terms of those aspects that are protected from important violations. A private company cannot be permitted to violate protected rights of the majority of Americans simply because they have claimed to be a "private company". We are the American people and the Courts must send a message that no private company can get away with manipulating the system so that they can govern the American people just because they have found a way to circumvent the United States Constitution. Nor can any branch of government, including the C.I.A. masquerade as a private company in order to

circumvent the rights of the American people that are guaranteed by the United States Constitution. Facebook AKA Lifelog controls the free speech of far too many American citizens to argue that they are not “governing” the lives of the majority of American citizens. Facebook has set itself up to control expression of religious beliefs, define what constitutes hate speech, regulate the rights of Americans to freely assemble online and punish American citizens with no due process in advance of grievance losses. All of these violations under the deceptive guise of community rules when in reality, Facebook is nothing more than a C.I.A. government agency program known as lifelog, monitoring and governing the American people of the United States of America in violation of the rights guaranteed by the United States Constitution. The claim that Facebook is simply enforcing their private community rules cannot be permitted when that enforcement/exercise violates the protected rights of the vast majority of American citizens or when such enforcement constitutes government of the American people. Facebook cannot be permitted to hide behind the façade of being a private company while violating protected rights of the American people in a way that clearly rises to the level of governance. Public interest requires that Facebook be ordered to comply with the United States Constitution. If Facebook wishes to control or govern the American people in an unofficial capacity, they must not violate the rights that are protected under the United States Constitution of those American Citizens. The Courts must recognize that the protected rights of the American people under the United States Constitution, by far, outweighs the rights of Defendant Mark Zuckerberg and Facebook to enforce their “private” community rules when those rules violate the protected rights of the American people on such a huge and unprecedented scale. Furthermore, the United States Constitution clearly states that under the Supremacy Clause, no state can enact a law that violates the United States Constitution, nor can a private company enact community rules that violate the rights of American Citizens that are protected by the United States Constitution.

DAMAGES FOR PLAINTIFF THOMAS JAMISON

22. As a direct and proximate cause of the actions of the Defendants as described above, Plaintiffs have suffered damages. The damages suffered by Plaintiffs include but are not limited to compensatory damages, presumed damages, mental anguish, emotional distress,

- a. Compensatory damages;
- b. Presumed damages;
- c. Mental anguish;
- d. Emotional distress;
- e. Punitive damages
- f. Pre- and post-judgment interest;
- g. Any other damages or relief Plaintiff may show himself to be justly entitled.

PRAYER

22. Plaintiff, Thomas A. Jamison respectfully prays that Defendants named herein, be served with citation as required by law and that this Honorable Court grant judgment to Plaintiff against Defendants for all damages described above and such relief requested as well as all other relief to which Plaintiffs shows himself entitled.

Respectfully submitted,

Thomas A. Jamison

Pro se Plaintiff,

By: 

P.O. Box 453

Burnet, TX. 78611

(512) 909-8661

tjalan@msn.com

PLAINTIFF HEREBY DEMANDS TRIAL BY JURY

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL®

Thomas A. Jamison
P.O. Box 453
Burnet, TX, 78611



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800 Franklin Ave., Room 380
Waco, Texas 76701